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Attorney For Defendant Nicholas Silao

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
RIVERSIDE DIVISION

In re
PANDORA HOSPICE CARE, INC.

Debtor

KARL T. ANDERSON, CHAPTER 7
TRUSTEE

Plaintiff

vs.

NICHOLAS SILAO

Defendant

Case No. 6:17-bk-19336-SY

Adv. 6:18-ap-01193-SY

Before the Honorable Scott H. Yun

Chapter 7

**STIPULATION TO CONTINUE HEARING
RE: DEFENDANT'S MOTION TO ALLOW
WITHDRAWAL OF DEEMED ADMISSIONS
F.R.C.P. § 36(B)**

Date: 11-4-2020

Time: 10:00am

Place: 3420 Twelfth Street, Riverside, CA

Courtroom: 302

At the last 6-25-2010 hearing on Defendant Nicholas Silao's *Motion to Withdraw the Deemed Admissions*, the Court continued the hearing to 8-20-2020 at 9:30am, as a holding date and gave the parties several alternate hearing dates to choose from. Because the Court requires Sanaz Bereliani's live testimony at the hearing, the Court asked that the parties agree on an alternate hearing date, and if they cannot agree, the 8-20-2020 hearing date stands. The parties and Ms. Bereliani stipulated to continue the hearing on Defendant's *Motion to 11-4-2020* at 10:00am, and the Court ordered it.

On 10-22-2020, the Court clerk notified the parties that due to the Covid-19, pandemic, the

1 11-4-2020 hearing must be taken off calendar and rescheduled as the Courtroom will be dark that day.

2 The parties and Ms. Bereliani have agreed to continue the hearing on Defendant's *Motion* to
3 Thursday 3-18-2021 at 10:00am.

4 For some inexplicable reason, the parties' Stipulation was not filed with the Court, which the
5 parties apologize for.

6 On 11-4-2020, the Court heard the matter on the Motion and Baruch Cohen appeared via
7 Courtcall. The Court tentatively continued the matter as a holding date to 12-17-2020 at 9:30am, and
8 will await the parties' Stipulation and proposed Order to continue the hearing on Defendant's *Motion*
9 to Thursday 3-18-2021 at 10:00am.

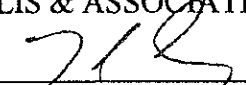
10
11 DATED: November 4, 2020

LAW OFFICE OF BARUCH C. COHEN, APLC

12 By 
13 Baruch C. Cohen, Esq.
14 Attorney For Defendant Nicholas Silao

15 DATED: November 4, 2020

POLIS & ASSOCIATES, APLC

16 By 
17 Thomas J. Polis, Esq.
18 Attorney For Plaintiff Karl T. Anderson, Chapter 7
19 Trustee

20 DATED: November 4, 2020

LAW OFFICE OF SANAZ BERELIANI

21 By _____
22 Sanaz Bereliani, Esq.
23 Bankruptcy Counsel for Nicholas Silao
24
25
26
27
28

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LAW OFFICE OF BARUCH C. COHEN, APLC

12 By _____
13 Baruch C. Cohen, Esq.
14 *Attorney For Defendant Nicholas Silao*

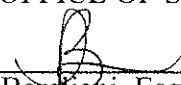
15 DATED: November 4, 2020

POLIS & ASSOCIATES, APLC

16 By _____
17 Thomas J. Polis, Esq.
18 *Attorney For Plaintiff Karl T. Anderson, Chapter 7*
19 *Trustee*

20 DATED: November 4, 2020

LAW OFFICE OF SANAZ BERELIANI

21 By  _____
22 Sanaz Bereliani, Esq.
23 *Bankruptcy Counsel for Nicholas Silao*

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

4929 Wilshire Boulevard, Suite 940, Los Angeles, California 90010.

A true and correct copy of the foregoing document entitled: **STIPULATION TO CONTINUE HEARING RE: DEFENDANT'S MOTION TO ALLOW WITHDRAWAL OF DEEMED ADMISSIONS F.R.C.P. § 36(B)** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On 11/4/2020, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Baruch C Cohen	bcc@BaruchCohenEsq.com, paralegal@baruchcohenesq.com
Karl T Anderson (TR)	2edansie@gmail.com, kanderson@ecf.axosfs.com
Thomas J Polis (PL)	tom@polis-law.com, paralegal@polis-law.com; r59042@notify.bestcase.com
US Trustee (RS)	ustpregion16.rs.ecf@usdoj.gov

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL: On 11/4/2020, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on 11/4/2020, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Hon. Scott H. Yun, USBC, Central District of California, 3420 Twelfth Street, Suite 345, Riverside CA 92501

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

11/4/2020
Date

Baruch C. Cohen, Esq.
Printed Name

/s/ Baruch C. Cohen
Signature